

# EXHIBIT E



**GEORGE K. CHEBAT (034232)**

George@EnaraLaw.com

**ROSS P. MEYER (028473)**

Ross@EnaraLaw.com

**Enara Law PLLC**

7631 East Greenway Road, Suite B-2

Scottsdale, Arizona 85260

Telephone: (602) 687-2010

[Filings@EnaraLaw.com](mailto:Filings@EnaraLaw.com)

*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiff,

vs.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd., a New York corporation Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and wife;  
Brian Colvin and Corrina Colvin, husband  
and wife; John Simon and Jean Simon,  
husband and wife; William Mcewen and  
Patricia Mcewen, husband wife; Rudy  
Chacon and Jane Doe Chacon, husband and  
wife; and Does 1 through 10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**DECLARATION OF HANNAH  
WATTS**

1 I, Hannah Watts, declare as follows:

2 1. I am over the age of 18 and a resident of Arizona.

3 2. I am a legal assistant at Enara Law PLLC (“Enara Law”).

4 3. On June 6, 2025, the firm conducted its first quarterly review since  
5 undersigned counsel’s appointment as Managing Attorney.

6 4. At that time, Ms. Silva alerted the firm that the Represented Defendants had  
7 filed a Motion to Strike based on Mr. Dimitrov’s Opposition being filed five (5) days past  
8 the deadline.

9 5. When the Motion to Strike and Reply was filed, I saved the document to this  
10 matter’s folder in preparation for the oral argument requested by Plaintiff in his  
11 Opposition.

12 6. I notified Ross P. Meyer and Morgan E. Silva that I had saved the document  
13 to the matter’s folder.

14 7. Generally, upon receipt of filings, Ms. Witgen or I save the filings to a  
15 matter’s folder and place the filing in the Firm’s Slack docketing thread for the filing  
16 response to be docketed.

17 8. I did not place the Motion to Strike and Reply in the Firm’s Slack docketing  
18 thread, as I did not recognize that a Motion to Strike had also been filed along with the  
19 Reply, requiring a docketing of the response.

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